

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO.: 1:22-cv-21004-MD

**JESSICA GUASTO,**

Plaintiff,

vs.

**THE CITY OF MIAMI BEACH, FL,**  
a Florida municipality,

Defendant.

\_\_\_\_\_ /

**PLAINTIFF'S WITNESS LIST – EXHIBIT C**

\_\_\_\_\_ Government      x   Plaintiff    \_\_\_\_\_ Defendant    \_\_\_\_\_ Court

|    | Name  | Subject and Brief Description of Testimony  | Date(s) Testified<br>(Court Only) |
|----|---|---|-----------------------------------|
| 1. | Jessica Salabarría, Plaintiff<br>c/o Daniel Barroukh<br>Derek Smith Law Group, PLLC<br>520 Brickell Key Drive, Suite O-301<br>Miami Florida 33131 | Plaintiff is expected to testify to her knowledge regarding discriminatory and retaliatory actions by the City of Miami Beach; facts of this case and her employment with the City of Miami Beach.  |                                   |
| 2. | Reginald Lester<br>[REDACTED]<br>[REDACTED]   | Mr. Lester is expected to testify to his knowledge regarding Plaintiff's employment, Plaintiff's claims alleged in the complaint, the City of Miami Beach's policies and procedures, and treatment of other employees at the City of Miami Beach. |                                   |

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| 3. | Paul Ozaeta<br>[REDACTED]<br>[REDACTED]                                     | Mr. Ozaeta is expected to testify to his knowledge regarding Plaintiff's employment, Plaintiff's claims alleged in the complaint, the City of Miami Beach's policies and procedures, and treatment of other employees at the City of Miami Beach |  |
| 4. | Steven Cosner<br>[REDACTED]<br>[REDACTED]<br>or<br>[REDACTED]<br>[REDACTED] | Mr. Cosner is expected to testify to his knowledge regarding Plaintiff's employment, Plaintiff's claims alleged in the complaint, the City of Miami Beach's policies and procedures, and treatment of other employees at the City of Miami Beach |  |
| 5. | John Buhrmaster<br>[REDACTED]<br>[REDACTED]                                 | Mr. Buhrmaster is expected to testify to his knowledge regarding Plaintiff's employment, the City of Miami Beach's policies and procedures, and treatment of employees at the City of Miami Beach.   |  |
| 6. | Jerrrome Berrian, Jr.<br>[REDACTED]<br>[REDACTED]                           | Mr. Berrian is expected to testify to his knowledge regarding Plaintiff's employment, the City of Miami Beach's policies and procedures, and treatment of employees at the City of Miami Beach.  |  |
| 7. | Leon Azicri<br>[REDACTED]<br>[REDACTED]                                     | Mr. Azicri is expected to testify to his knowledge regarding Plaintiff's employment, the City of Miami Beach's policies and procedures, and treatment of employees at the City of Miami Beach.   |  |

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| 8.  | Makin Pomares<br>[REDACTED]<br>[REDACTED]  | Mr. Pomares is expected to testify to his knowledge regarding Plaintiff's employment, the City of Miami Beach's policies and procedures, and treatment of employees at the City of Miami Beach.   |  |
| 9.  | Rodney McCaskill<br>[REDACTED]<br>[REDACTED]   | Mr. McCaskill is expected to testify to his knowledge regarding Plaintiff's employment, the City of Miami Beach's policies and procedures, and treatment of employees at the City of Miami Beach.   |  |
| 10. | Richard Clements<br>c/o MLE Law<br>1212 NE 16 <sup>th</sup> Terrace<br><br>Fort Lauderdale, FL 33304 | Mr. Clements is expected to testify to his knowledge regarding Plaintiff's employment, Plaintiff's claims alleged in the complaint, the City of Miami Beach's policies and procedures, the treatment of other employees at the City of Miami Beach, and the reasons for the City of Miami Beach invoking Plaintiff's letter of resignation. |  |
| 11. | Nicholas Guasto<br>[REDACTED]<br>[REDACTED]  | Mr. Guasto is expected to testify to his knowledge regarding Plaintiff's employment, Plaintiff's claims alleged in her Complaint, the City of Miami Beach's policies and procedures, and treatment of employees at the City of Miami Beach.   |  |
| 12. | Defendant's Witnesses<br><br>c/o MLE Law<br>1212 NE 16 <sup>th</sup> Terrace                         |   |  |

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|--|---------------------------|--|--|
|  | Fort Lauderdale, FL 33304 |  |  |
|--|---------------------------|--|--|

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on September 18, 2024, on all counsel of record on the service list below via e-email.

By: /s/ Daniel J. Barroukh  
Daniel J. Barroukh, Esq.

**SERVICE LIST**

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